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10 *Progressive Northern Insurance*  
11 *Company*

12 UNITED STATES DISTRICT COURT  
13  
14 DISTRICT OF NEVADA

15 ARASH HASHEMI,

16 Plaintiff,

17 vs.

18 PROGRESSIVE NORTHERN INSURANCE  
19 COMPANY, a foreign corporation; DOES I  
20 through X inclusive; and ROE  
21 CORPORATIONS, I through X, inclusive,

22 Defendants.

CASE NO.: 2:19-cv-00212-RFB-NJK

STIPULATED PROTECTIVE ORDER

23 IT IS HEREBY STIPULATED AND AGREED by and between the parties hereto, by and  
24 through their respective attorneys, to the following:

25 1. This Order shall be in effect and shall govern all documents produced and  
26 information provided by Progressive Northern Insurance Company in response to the Plaintiff's  
27 Interrogatories and Request for Production of Documents in the instant litigation for documents  
28 or things (including, but not limited to, portions of the Progressive Northern Insurance Company  
Claims Standards and documents regarding employee training and job descriptions.)

1           2.       The documents produced and information provided shall be deemed to have  
2       been designated as CONFIDENTIAL MATERIALS when the same have had affixed to them the  
3       following notice:

4                   CONFIDENTIAL MATERIALS PRODUCED BY PROGRESSIVE NORTHERN  
5                   INSURANCE COMPANY IN CONJUNCTION WITH THE LAWSUIT OF (Hashemi v.  
6                   Progressive Northern Insurance Company).

7           3.       Counsel and the parties shall not disclose, make available or communicate  
8       CONFIDENTIAL MATERIALS to any person, entity or organization except to those persons  
9       designated in this Order and only in accordance with the procedures established by this Order.  
10       In this regard:

11                   (a)       Counsel may disclose such information to clerical personnel and attorneys  
12                   directly employed by their law firms to the extent that the disclosures are necessary for  
13                   the preparation of this litigation for trial or appeal. All such clerical personnel and  
14                   attorneys shall be bound by the provisions of this Order.

15                   (b)       All persons to whom disclosure is to be made, other than those persons  
16                   described in subparagraph 4 (a) below, shall acknowledge, in writing, the terms of this  
17                   Order. Each such person shall agree that the disclosed information is confidential, is not  
18                   to be disclosed by him or her or to anyone else and is not to be used for any purpose  
19                   other than the preparation of this litigation for trial or appeal.

20                   (c)       Counsel for parties to whom CONFIDENTIAL MATERIALS have been produced or  
21                   disclosed shall not, without prior consent of counsel for Progressive Northern Insurance  
22                   Company, disclose the CONFIDENTIAL MATERIAL except as provided by the terms of this  
23                   Order.

1 Order.

2 4. The parties, through counsel of record in this litigation, may disclose  
3 CONFIDENTIAL MATERIALS to expert witnesses or consultants provided that the following  
4 procedures and restrictions shall apply to such disclosure:  
5

6 (a) Before receiving CONFIDENTIAL MATERIALS, the expert witness or consultant  
7 shall execute an acknowledgment that he or she has received a copy of this Order, has  
8 reviewed a copy of this Order and that he or she understand that he or she is bound by  
9 the provisions of this Order;  
10

11 (b) No expert witness or consultant to whom such CONFIDENTIAL MATERIALS have  
12 been disclosed shall use such information except for preparation for trial of this  
13 litigation, the trial itself or an appeal of this litigation; and  
14

15 (c) No such expert or consultant shall disclose CONFIDENTIAL MATERIALS he or she  
16 has received hereunder to any other person or entity without prior written consent of  
17 counsel for Progressive Northern Insurance Company.  
18

19 5. Any CONFIDENTIAL MATERIALS used at any deposition shall be sealed as shall  
20 that portion of the deposition transcript.

21 6. **See order issued concurrently herewith.**  
22

23  
24 7. Nothing contained in this Order shall be construed to prejudice the Plaintiff's right  
25 to use, in open court, any CONFIDENTIAL MATERIALS provided that prior to the said use of such  
26 CONFIDENTIAL MATERIALS, Plaintiff's counsel gives reasonable notice to counsel for  
27  
28

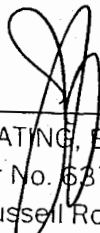
1 Progressive Northern Insurance Company of such intent, so that the confidentiality of such  
2 CONFIDENTIAL MATERIALS may be protected as determined and directed by the agreement of  
3 the parties with the approval of the Court. If Plaintiff's counsel cannot provide reasonable  
4 notice to counsel for Progressive Northern Insurance Company under the particular  
5 circumstances, Plaintiff's counsel will undertake to protect the confidentiality of the materials.  
6

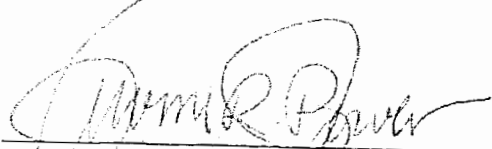
7 8. Upon termination of this litigation, all CONFIDENTIAL MATERIALS, including any  
8 copies, in the custody of the parties or counsel for the parties or in the custody of any person to  
9 whom counsel for the parties has disclosed such CONFIDENTIAL MATERIALS, shall be returned  
10 to counsel for Progressive Northern Insurance Company.  
11

12 DATED this 10 day of September, 2019. DATED this 4th day of September, 2019.  
13

14 K E A T I N G LAW GROUP

BOWEN LAW OFFICES

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22 *Arash Hashemi*

23 ORDER

24 IT IS SO ORDERED this 12 day of September, 2019.  
25

26   
27 United States Magistrate Judge  
28